



State of New Jersey

Department of Environmental Protection

DONALD T. DiFRANCESCO  
Acting Governor

Robert C. Shinn, Jr.  
Commissioner

NOV 26 2001

Mr. Cristopher Anderson  
Director Environmental Affairs  
L.E. Carpenter & Company  
Suite 36-5000  
200 Public Square  
Cleveland, OH 44114

Dear Mr. Anderson:

Re: L.E. Carpenter Superfund Site  
Wharton, Morris County

The New Jersey Department of Environmental Protection and EPA have reviewed the Workplan to Evaluated Free Product Remedial Strategies dated November 2001 and have the following comments:

1. Page 2-1: The text states that soils "suspected of lead contamination" will be stockpiled. How is this to be determined? Similarly soils "potentially contaminated with DEHP and BTEX" will be placed on the bench. Is this to be done by simple visual inspection (i.e., whether product is visible)? In addition, does this procedure introduce the possibility of spreading contamination to the bench area, or is it presumed that that depth will already be contaminated? Finally, as discussed during the conference call, it is recommended that it would be more conservative to place the soils on a plastic liner to ensure that contamination is not inadvertently spread.
2. Page 2-2, Task 2: If the test pits are to be backfilled with washed stone, what will happen to the contaminated soils? Will the soils be shipped off-site as IDW, will they simply be left on site, or backfilled? The disposition of these soils should be addressed in the work plan.
3. Page 2-2, Task 2: Product thickness in the proposed recovery wells may not be representative of the effect of trenches, which would presumably use horizontal piping. How will the final report of the pilot testing field results handle this issue?
4. Page 2-2, Task 3: The text states that sampling for metals "may be necessary." How will this be determined? As mentioned during the conference call, we believe that the testing for RCRA metals should be a required part of the work plan.
5. Page 2-2, Task 3: The text gives very little detail on the bench scale study. Typically, work plans of this sort give more information about the testing apparatus and specific analysis

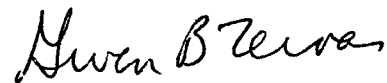


methods. In addition, it should be clear what parameters will be monitored by the Combustible Emissions Monitor (CEB). Will the CEB give constant minimum readings below the appropriate safety and emissions criteria, or will measurements be taken at certain intervals? At what temperature(s) will the bench tests be run?

6. Page 2-3, Task 3: The text needs to be clearer about what other technologies would be evaluated and how. If this would be the subject of a work plan addendum, it would be sufficient to note this.
7. Page 2-3, Task 4: In a number of places, the text states that "up to 3" samples will be collected. What will determine the number of samples? At a minimum, we recommend that 3 samples be taken.
8. As we discussed, a project specific Health and Safety Plan must be submitted and in place before field work begins. In addition, as we discussed, the original Health and Safety plan should be updated, if needed, and submitted to EPA.
9. The final version of the work plan should provide a detailed schedule outlining key activities and anticipated completion dates.

Please feel free to contact me at (609) 633-7261 if you have any questions.

Sincerely,



Gwen B. Zervas, P.E.  
Section Manager  
Bureau of Case Management

C: Stephen Cipot, USEPA  
Nicholas Clevett, RMT